

RANDAZZA
LEGAL GROUP

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January 3, 2025

Via CM/ECF

Hon. Andrew E. Krause
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

***Re: Project Veritas, et al. v. James O’Keefe, et al., No. 7:23-cv-04533
Update Regarding Maxwell Settlement***

Dear Judge Krause,

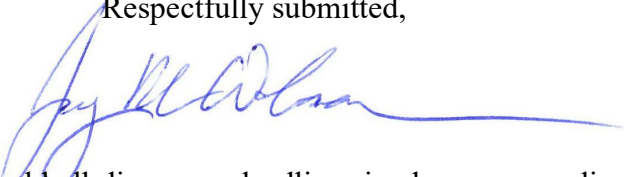
Pursuant to the order memorialized in the Minute Entry of December 13, 2024, Plaintiffs Project Veritas and Project Veritas Action Fund hereby file their update to the Court regarding their settlement with Mr. Maxwell.¹

As the Court is aware, at the Conference of December 13, 2024, Mr. Maxwell represented that he was having his advisors review the most recent iteration of the proposed written agreement that had been transmitted to him on November 12, 2024. He also indicated it was likely that he would execute it.

Having not heard further, the undersigned reached out to Mr. Maxwell on December 23 & 27, 2024. On December 30, 2024, Mr. Maxwell responded, and a minor edit was made per his request. It was, thereupon, sent to him for signature. On January 3, 2025, the undersigned followed up and Mr. Maxwell said he was “[s]igning the document shortly.”

Once Mr. Maxwell signs it,² it will be sent to Plaintiffs’ representatives for counter-signature. Thank you for your attention to this matter.

Respectfully submitted,



¹ Although the Court determined to hold all discovery deadlines in abeyance pending the resolution of Plaintiffs’ counsel’s motion to withdraw (ECF No. 117), the deadline to update the Court regarding the Maxwell settlement is not a discovery deadline and, thus, this update is provided. Plaintiffs’ counsel notified Mr. Maxwell of their interpretation of the orders on December 23, 2024.

² If he does not do so, Plaintiffs would be left with little choice but to either move to enforce the mediated agreement or, in the alternative, move for entry of default.

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Page 2 of 2

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cc: All Counsel of Record (Via CM/ECF)
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